NYNEX Government Affairs 1300 I Street NW Suite 400 West Washington DC 20005 202-336-7891

Kenneth Rust

Director
Federal Regulatory Matters

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### EX PARTE OR LATE FILED

October 24, 1995

Ex Parte

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. - Room 222 Washington, D.C. 20554 RECEIVED

OCT 2 4 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Data Request in CC Docket No. 95-72

Dear Mr. Caton:

In a letter to me dated September 29, 1995, Kathleen Wallman, Chief, Common Carrier Bureau requested that the NYNEX Telephone Companies (NYNEX) provide data regarding the relative non-traffic sensitive (NTS) costs of single channel and multi-channel services to allow members of her staff to determine the proper number of Subscriber Line Charges (SLCs) to apply to derived channel services like ISDN. Attached are the requested data, edited to exclude proprietary information. A full set of data are being sent to Ms. Wallman, along with a request for confidential treatment. NYNEX continues to believe, however, that the only costs that are relevant when seeking to establish the proper level of assigned Interstate costs to be recovered via SLCs are those loop costs booked to accounts in the Common Line basket.

We will be contacting the appropriate members of the Common Carrier Bureau to clarify our concerns more fully, but in the meantime any questions regarding the data should be directed to me at the address or telephone number shown above.

Sincerely, Kunt

Attachment

cc: K. Wallman

L. Gelb

J. Myles
NYNEX Recycles

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### NYNEX Response FCC Data Request in CC Docket No. 95-72

-72
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

1) For each switched loop service you offer, please identify the NTS cost components, including any NTS cost components located in the central office. For each component, please provide a short name, a brief description, the USOA account number, and the separations category.

### See Attachment 1, p. 1

(The costs for purposes of this request represent 1993 embedded direct costs for the state of New York.)

For each service, please provide the number of voice grade-equivalent channels per unit of service, indicate whether the customer provides a digital or analog signal, and note any waivers or interpretations of the FCC's rules governing the placement of termination equipment on the customer's premises.

	No. of VG Equivalents	Type of Signal	<u>Waivers</u>
1MR	1	Analog	None
1FR	1	Analog	None
1MB	1	Analog	None
PBX/Trunk	1	Analog/Digital	None
Centrex III	1	Analog/Digital	None
Intellipath	1	Analog/Digital	None
Flexpath	up to 24	Digital	None
Primary Rate ISDN	up to 24	Digital	None
Basic Rate ISDN	1 or 2	Digital	None

2) For each NTS cost component of each service, please provide the total annual cost booked, allocated to interstate, and apportioned to each access element for 1994. For capitalized costs, please provide the gross and net amounts and the annual depreciation expense.

### See Attachment 1, p. 2-3

(The data provided represent 1993 data.)

3) For each service please provide the total monthly cost per unit of service apportioned to each access element.

### See Attachment 1, p. 1

4) Explain any differences in NTS costs among different services.

Differences in NTS costs among the services reflect differences in both the actual office equipment and the outside plant facilities required for each of the services. Outside plant, or link, costs for different services reflect the special conditioning required for the four-wire connections necessary for services such as Flexpath and Primary Rate ISDN. Central office cost differences reflect the unique central office line termination equipment for each service. Different services require different types of line equipment cards, or terminations.

\* \* \* \* \* \* \* \* \*

### **COST COMPONENT SUMMARY**

Single Channel	Total Monthly Cost	<u>Cost</u> <u>Components</u>	Primary Access Rate Element Basket
[1MR, 1FR, 1MB, PBX/Trunk, Centrex III, Intellipath]	\$4.96-\$12.92 \$16.08-\$34.54	Port Link	Traffic Sensitive Common Line
Multi-Channel			
Flexpath	\$354.37 \$235.11	Port Link	Traffic Sensitive Common Line
ISDN-PRI	\$545.95 \$235.11	Port Link	Traffic Sensitive Common Line
Multi-Channel - Other			
ISDN - Basic	\$16.64 \$18.24	Port Link	Traffic Sensitive Common Line

ATTACHMENT 1

### **NYNEX - NEW YORK**

### INVESTMENTS AND MONTHLY COSTS

	ACCOUNT 2211	ACCOUNT 2212	ACCOUNT 2232	ACCOUNT 2362	ACCOUNT 2411	ACCOUNT 2421	ACCOUNT 2422	ACCOUNT 2423	ACCOUNT 2424	ACCOUNT 2431	ACCOUNT 2441	ACCOUNT 2426	ACCOUNT 2111	ACCOUNT 2121		Monthly Unit cost
	ANALOG SW.	DIG, SW	со скт.	NCTE	POLE	AERIAL	UG	BURIED	SUBMARINE	AER WIRE	CONDUIT	HSE CABLE	LAND	BUILDING		 per svc
Single Channel Svc	PARAMETER		<b>4</b>	le		<b>!</b>	Separations	Category	<b>4</b>	_	************	***********	<b>4</b>			<u></u> .
	Category 3	COE Category 3	Category 4.13	Category 1	Category 1.3	Category 1.3	Category 1.3	C8 Category 1.3	Category 1.3	Category 1.3	Category 1.3	Category 1.3	Various based	on Part 36 Rules		
	Local Switching	Local Switching	Circuit Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop	Subscriber Loop			[	
IMR			(Subscriber coop			<del></del>		4		<u></u>	<u> </u>				J	***
Link Port																\$18.18 \$4.96
Total																\$23.14
<i>IFR</i> Link																\$34.54
Port Total																\$4,96 \$39,51
																ψ35.3 i
IMB Link																\$18.24
Port <b>Tota</b> l																\$4,96 \$23,20
PBX/TRUNK																
Link Port																\$20.47 \$5,68
Total																\$26.15
CENTREX III																\$16.08
Link Port																\$12,70
Total																\$28.78
<i>INTELLIPATH</i> Link																\$21.65
Port <b>Total</b>																\$12.92 \$34.57
P	314						Separations	- Cistina.								
Multi Channel Services		COE		101	T			C	&WF				Various based	on Part 36 Rule	S	
	Category 3  Local Switching	Category 3 Local Switching		Category 1 Subscriber Loop	Category 2 Wideband	Category 2 Wideband	Category 2 Wideband	Category 2 Wideband			1					
FLEXPATH - DP (DID)	تــــا		Wideband	<u></u>	L	L	<u> </u>	<u> </u>	ــــــــــــــــــــــــــــــــــــــ	<u> </u>	Ц	┷——	┸——		_]	
Link Port																\$235.11 \$354.37
Total																\$589.49
ISDN - PRIMARY																*******
Link Port																\$235.11 \$545.95
Total																\$781.07
Multi Channel Other		ÇOE	200.0	101	<del></del>	<u> </u>	Separation:	s Category	&WF			<u></u>	Narious b	on Part 36 Rule	<del>-</del>	
	Category 3	Category 3	Category 4.13	Category 1	Category 1.3	Category 1.3		Category 1.3	Category 1.3		Category 1.3		1	JOH PAIL JO KUR	7	
	Local Switching	Local Switching	Circuit Subscriber Loop		Subscriber Loop	p Subscriber Loo	p Subscriber Loo	p Subscriber Loo	p Subscriber Loo	Subscriber Loo	p Subscriber Loo	p Subscriber Loo	P)		ا	
<i>ISDN - BASIC</i> Link															_	\$18.24
Port Total																\$16.64 \$34.88
																434.00

## NYNEX - NEW YORK

# SEPARATIONS-BASED COST/INVESTMENT SUMMARY

DEM IS BAF IS WIDEBAND IS			
17.00% 25.00%	ANALOG SW.	2211	ACCOUNT
17.00% 25.00% 90.00%	DIG. SW	2212	ACCOUNT
17.00% 25.00% 90.00%	CO CKT.	2232	ACCOUNT
17.00% 25.00% 90.00%	NCTE	2362	ACCOUNT
17.00% 25.00% 90.00%	POLE	2411	ACCOUNT
17.00% 25.00% 90.00%	AERIAL	2421	ACCOUNT
17.00% 25.00% 90.00%	ຣ	2422	ACCOUNT
17.00% 25.00% 90.00%	BURIED	2423	ACCOUNT
17.00% 25.00% 90.00%	SUBMARINE	2424	ACCOUNT
17.00% 25.00% 90.00%	AER WIRE	2431	ACCOUNT
17.00% 25.00% 90.00%	CONDUIT	2441	ACCOUNT
25.00% 90.00%	HSE CABLE	2426	ACCOUNT
	LAND	1117	ACCOUNT
	BUILDING	1717	ACCOUNT
		JIST FBUO	and/Bld
		W/O LGD	Total Cost
		#/ L00	Total Cost

IMR Total Cost

IFR
Total
(BASIS for IS allocation)
(BASIS for IS allocation)
Allocated to interstate
Common Line
Traffic Sensitive
Trunking (Special Access) Common Line Traffic Sensitive Trunking (Special Access)

Total
(BASIS for IS allocation)
Allocated to Interstate
Common Line
Traffic Sensitive
Trunking (Special Access)

### PBX/TRUNK Total

(BASIS for IS allocation)
Allocated to Interstate
Common Line
Traffic Sensitive
Trunking (Special Access)

### CENTREX III Total

Common Line Traffic Sensitive Trunking (Special Access) (BASIS for IS allocation)
Allocated to Interstate

### INTELLIPATH Total

(BASIS for IS allocation)
Allocated to Interstate
Common Line
Traffic Sensitive
Trunking (Special Access)

### FLEXPATH - DP (DID) Total

(BASIS for IS allocation)
Allocated to Interstate
Common Line
Traffic Sensitive
Trunking (Special Access)

### ISDN - PRIMARY Total

(BASIS for IS allocation)
Allocated to interstate
Common Line
Traffic Sensitive
Trunking (Special Access)

### ISDN - BASIC Total

Common Line Traffic Sensitive Trunking (Special Access) (BASIS for IS allocation)
Allocated to Interstate

### ATTACHMENT 1

# NYNEX - NEW YORK

IMR TPIS Average Net Inv Deprec Exp	book to net - ratio Depreciation ratio
	ACCOUNT / 2211 / ANALOG SW 0.285800 0.101000
	ACCOUNT AC 2212 CI DIG. SW CI 0.560980 0.071000
	ACCOUNT 2232 CO CKT. 0.423450 0.102000
	ACCOUNT 2362 ROTE ROTE 0.440210 0.172000
	2411 POLE 0.458260 0.065000
	ACCOUNT 2421 AERIAL AERIAL 0.589540 0.073000
	ACCOUNT 2422 UG 0.486370 0.055000
	ACCOUNT  2423  BURIED  0.489600 0.0489000
	ON SI
	ACCOUNT 2431 AER WIRE 00 0.244990 0.121000
	ACCOUNT 2441 CONDUIT 0.629070 0.019000
	ACCOUNT 2426 HSE CABLE 0.593160 0.065000
	ACCOUNT 2111 LAND 1,000000 0,000000
	ACCOUNT 2/27 BUILDING 0.664/170 0.022000

(QiQ)	Average Net Inv Deprec Exp ISDN - BASIC TPIS Average Net Inv Deprec Exp	FLEXPATH - DP (DID) TPIS Average Net inv Deprec Exp ISDN - PRIMARY TPIS	INTELLIPATH TPIS Average Net Inv Deprec Exp	CENTREX III TPIS Average Net Inv Deprec Exp	PBX/TRUNK TPIS Average Net Inv Deprec Exp	IMB TPIS Average Net Inv Deprec Exp	IFR TPIS Average Net Inv Deprec Exp
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